

**FRANZ FISCHLER**

MITGLIED DER EUROPÄISCHEN KOMMISSION

27 -09- 2001

CAB - D / 2105

Dear Dr. Lucas,

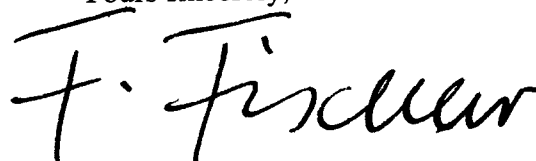
I thank you for your letter of 13 July 2001 concerning organic transition periods and certification, and in particular the practices in respect of reducing the conversion period in certain Member States.

I first would like to indicate that paragraph 1 of annex I of Regulation (EEC) n° 2092/91 provides for some flexibility with regard to the 2 year conversion period. Effectively the text provides that « the inspection body may, with the approval of the competent authority, decide in certain cases, to extend or reduce that period, having regard to previous parcel use ». This may imply a reduction to zero, in case it is demonstrated that the parcels concerned were for example natural areas for a long period.

Detailed discussions on the practices in Member States concerning the reduction of the conversion period took place in the meeting of the working group « Legislation » of the Standing Committee on Organic Farming on 22-23 March 2000. It appeared from these discussions that Member States did not apply the provisions in the same way, and in particular that certain Member States did not accept a conversion period of less than 12 months, while others accepted, in certain conditions, a reduction up to zero.

The Commission services are currently discussing with the Member States a proposal for an amendment of the above mentioned provision of annex I, in order to define in a more precise way under which conditions a reduction of the conversion period may be granted. It is expected that, once adopted, such provision would streamline the practices with regard to reduction of the conversion period in the Member States.

Yours sincerely,



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